



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

November 25, 2013

Mary Farnsworth, Forest Supervisor
Idaho Panhandle National Forests
Forest Plan Revision
3815 Schreiber Way
Coeur d'Alene, Idaho 83815

Re: EPA Region 10 Review of the Idaho Panhandle National Forests Land Management Plan, Final Environmental Impact Statement, and Draft Record of Decision.
EPA Project Number: 02-032-AFS.

Dear Ms. Farnsworth:

The EPA has reviewed the Project's FEIS in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

In our May 7, 2012 letter¹ we assigned an Environmental Concerns – Insufficient Information (EC-2) rating to the Draft EIS. We were primarily concerned that the draft Land Management Plan's Objectives, Standards and Guidelines did not include enough detail to ensure that Desired Conditions – especially for watersheds and water quality – would be achieved in a reasonable timeframe. To address this concern we recommended that the Forests consider additional and revised Objectives, Standards and Guidelines. Where the substance of our recommended addition or revision is addressed in other Forest Service directives, we recommended that the final LMP reference, summarize or identify the relevant law, regulation or policy which similarly helps to achieve Desired Conditions. We were also concerned about inconsistent conclusions regarding the alternatives' overall effect on water quality, soil productivity, riparian, and aquatic habitats.

The Final EIS is responsive to our recommendations. Your detailed responses to our comments show your careful consideration of our suggestions for additional and revised Objectives, Standards and Guidelines. We note that revisions based on our recommendations were made to Mineral Desired Conditions (FW-DC-MIN-01, to ensure consistency with desired conditions for other resources) and Aquatic Habitat Objectives (FW-OBJ-AQH-02, to improve the context of the objective). Where the substance of our recommended addition or revision is addressed in other Forest Service directives, FEIS Appendix G provides references, summarizes or identifies the relevant law, regulation or policy which similarly helps to achieve Desired Conditions.

In several instances, the USFS's response to our comments indicates that issues raised will be analyzed and incorporated at the project level. These issues include potential impacts to Clean Water Act Section 303(d)-listed impaired water bodies, the goals and direction of relevant Total Maximum Daily Loads,

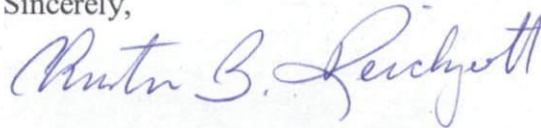
¹ [http://yosemite.epa.gov/oeca/web/eis.nsf/\(PDFView\)/20110440/\\$file/20110440.PDF?OpenElement](http://yosemite.epa.gov/oeca/web/eis.nsf/(PDFView)/20110440/$file/20110440.PDF?OpenElement)

and identification of, and measures to protect, source water protection areas and public water supplies. We appreciate the Forests' commitment to address these issues during site-specific analyses.

With regard to our overall watershed trend analysis concerns, clarifying information in the Final EIS - such as your helpful changes to Table 6. Comparison of Resource Key indicators for Revision Topics by Alternatives - addresses our concern regarding inconsistent conclusions for the alternatives' overall effect on water quality, soil productivity, riparian, and aquatic habitats.

We appreciate the Idaho Panhandle National Forests and Kootenai National Forest staff's efforts to engage with EPA Region 8 and EPA Region 10 NEPA review staff directly. If you have questions regarding our comments, please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or, Erik Peterson. Erik can be reached at (206) 553-6382 or by electronic mail at peterson.erik@epa.gov.

Sincerely,

A handwritten signature in blue ink, reading "Christine B. Reichgott". The signature is fluid and cursive, with the first name "Christine" and last name "Reichgott" clearly legible.

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit